

RONALD A. GILLER, Esq.
RGILLER@GRSM.COM
DIRECT DIAL: 973-549-2501

MALLORY J. BENNER, Esq.
MBENNER@GRSM.COM
DIRECT DIAL: 973-549-2555



ATTORNEYS AT LAW
1 BATTERY PARK PLZ
NEW YORK, NY 10004
WWW.GRSM.COM
(973) 549-2500

March 13, 2025

VIA ECF

The Honorable Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, New York 10007

Re: Charles Johnson v. Clearview AI, Inc., et. al.
Case No. 1:23-cv-02441

Dear Judge Failla:

As you know, we represent Defendants Clearview AI, Hoan Ton-That, and Richard Schwartz in this matter. On March 3, 2025, the Court scheduled a conference for April 2, 2025 to discuss Plaintiff Charles Johnson's prior violations of its January 16, 2025 Order (Dkt #68, 77). In the Court's March 3, 2025 Order, the Court warned Mr. Johnson to "adhere closely to the text of the Court's Order (Dkt. #68)."

Despite these two Orders, two days after the March 3rd Order was entered, Mr. Johnson proceeded to post false and defamatory statements about both the Defendants and me. (See <https://charlesjohnson.substack.com/p/what-youre-supposed-to-believe-turkish>, a copy of which is attached hereto.)

We felt compelled to alert the Court of Mr. Johnson's continuing violations of the Court's Orders in light of the upcoming conference.

Respectfully Submitted,
GORDON & REES LLP

/s/ Ronald A. Giller
Ronald A. Giller, Esq.

RAG:MJB
Enclosures